

PSJ1 Exh 51

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Sent: Fri, 28 Aug 2015 13:43:26 -0400
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Cc: Chunderlik, George
Subject: 30-010 - Inventory Control - Suspicious Order Policy FINAL.docx
Attachments: 30-010 - Inventory Control - Suspicious Order Policy FINAL.docx

Here is the policy we submitted for VAWD. The execution occurs as follows.
We have threshold monitoring that uses an average company movement for each scheduled chemical entity; but the thresholds are not customized to individual store movements.
Pinpoint Audit from Supplylogix is used to review inventory build and possible diversion flags.
Pinpoint Monitor from Supplylogix is reviewed to identify high risk controlled substance prescription movement.
Team members at the distribution center identify unusual pick quantities and escalate the flagged items to the facility supervisor who escalates the issue to the GE Pharmacy team.

Here is a good article from QPharma. <http://www.qpharmacorp.com/som-programs.html>





INVENTORY CONTROL - SUSPICIOUS ORDER POLICY

Policy Number: 30-010	Version/Revision Number: 002
Effective Date: 8/1/14	Revision Date: 4/9/2015
Created Date: 8/1/14	Last Reviewed Date: 4/9/2015
Policy Owner: Matt Rogos	Department: HBC Service Co.
Reference(s): HBC-PAP001-001	

PURPOSE/OBJECTIVE:

To identify, investigate, record, and report suspicious pharmaceutical product orders

SCOPE:

This policy applies to:

- All HBC TMs who have access to the HBC pharmacy room.

POLICY:

- Identified individuals from Giant Eagle Sourcing, Pharmacy Compliance, and HBC Team Members (TMs) must review pharmacy customer orders and order trends on a regular and for-cause basis to identify suspicious drug orders
- Suspicious orders are blocked and reported to the appropriate regulatory authority within the specified time frame as required

PROCEDURES:

Reporting suspicious prescription product orders

- Giant Eagle and HBC team members review customer orders and order history trends to identify suspicious drug orders
- Suspicious order criteria include, but are not limited to:
 - Purchases over a defined time period that exceed a pre-determined threshold
 - Orders of unusual quantities compared to a customer's order history
 - Unique pattern of orders that differs from similar customers
 - Orders received outside of the normal pharmacy customer ordering process
- Identified orders are investigated to determine if the order is suspicious or legitimate
- Legitimate orders are released for processing and delivery to the customer

- Suspicious orders are blocked and reported to the applicable regulatory authorities within the specified time frame as required
 - Board of Pharmacy and FDA within three (3) business days
 - DEA (if controlled substance) upon determination
- HBC prepares and communicates any history of suspicious orders to the GE Pharmacy team as requested.
- HBC retains the records of the investigation and outcome for six (6) years

COMPLIANCE:

Non-compliance with this policy will result in progressive discipline up to and including termination in compliance with Human Resource guidelines